## WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050

William A. Maher Paul R. DeFilippo James N. Lawlor Adam M. Bialek

## ROLLIN BRASWELL FISHER LLC

8350 E. Crescent Pkwy., Suite 100 Greenwood Village, Colorado 80111

Telephone: (303) 945-7415 Facsimile: (303) 974-7468

Michael A. Rollin

Maritza Dominguez Braswell (pro hac vice)

Counsel for Lehman Brothers Holdings Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
	:	Chapter 11
In re:	:	
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	
	:	
Debtors.	:	
	X	

## NOTICE OF WITHDRAWAL OF LEHMAN BROTHERS HOLDINGS INC.'S MOTION TO ENFORCE THE AUTOMATIC STAY, THE PLAN, AND THE CONFIRMATION ORDER AS TO SECURITYNATIONAL MORTGAGE COMPANY

PLEASE TAKE NOTICE that on February 17, 2016, Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator for the entities in the above referenced chapter 11 cases (the "Debtors"), filed a Motion to Enforce the Automatic Stay, the Plan of Reorganization and the Confirmation Order against iFreedom Direct Corporation (formerly known as New Freedom

Mortgage Corporation) ("<u>iFreedom</u>") and SecurityNational Mortgage Company ("SecurityNational") (the "Motion") [Dkt. No. 52076].

**PLEASE TAKE FURTHER NOTICE** that on April 21, 2016, iFreedom filed an Objection to Motion to Enforce Automatic Stay [Dkt. No. 52550].

**PLEASE TAKE FURTHER NOTICE** that on April 25, 2016, SecurityNational filed a Memorandum in Opposition to Motion to Enforce Automatic Stay [Dkt. No. 52585].

**PLEASE TAKE FURTHER NOTICE** that on April 28, 2016, LBHI filed a Reply to iFreedom's and SecurityNational's Opposition and in Further Support of Lehman Brothers Holdings Inc.'s Motion to Enforce the Automatic Stay, the Plan, and the Confirmation Order Against iFreedom and SecurityNational [Dkt. No. 52643].

**PLEASE TAKE FURTHER NOTICE** that on May 5, 2016, this Court heard oral argument on the Motion.

**PLEASE TAKE FURTHER NOTICE** that LBHI is hereby withdrawing the Motion as to SecurityNational. This withdrawal shall only apply to SecurityNational, is without prejudice, and shall not have any force or effect as to any other entity subject to the Motion.

Dated: New York, New York August 26, 2016

/s/ Adam M. Bialek

William A. Maher Paul R. DeFilippo James N. Lawlor Adam M. Bialek

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050

and

Michael A. Rollin Maritza Dominguez Braswell (pro hac vice)

ROLLIN BRASWELL FISHER LLC 8350 E. Crescent Pkwy., Suite 100 Greenwood Village, Colorado 80111

Telephone: (303) 945-7415 Facsimile: (303) 974-7468

Counsel for Lehman Brothers Holdings Inc.